

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION**

Vagish, LLC, doing business as Cambridge
Plaza Hotel, and Va Va Vagish, LLC, doing
business as Legends Lounge,

Plaintiffs,

vs.

Seneca Specialty Insurance Company,

Defendant.

C/A No.: 3:13-cv-03161-TLW

**Plaintiffs' memorandum of law in response to Defendant's motion *in limine*
regarding Plaintiff's insurance broker as an agent of Seneca**

Defendant Seneca Specialty Insurance Company (Seneca) moved the Court *in limine* for an order “prohibit[ing] Plaintiffs and their counsel from introducing evidence or otherwise arguing or asserting that A.J. Shaw or JAG Insurance Company were agents or acted as agents of Seneca at any time” with regard to the policy and claim disputed in this action. Dkt. No. 127 at 1.

Plaintiffs Vagish, LLC, doing business as Cambridge Plaza Hotel, and Va Va Vagish, LLC, doing business as Legends Lounge (collectively, “Vagish”) have considered the argument and authority submitted by Seneca and interposes no objection to the motion being granted.

Respectfully submitted by,

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September 8, 2016
Columbia, South Carolina.